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13 Proposed Attorneys for The Roman Catholic
14 Archbishop of San Francisco

15 UNITED STATES BANKRUPTCY COURT

16 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

17
18 In re
19 THE ROMAN CATHOLIC ARCHBISHOP
OF SAN FRANCISCO,

20 Debtor and
21 Debtor in Possession.

Case No. 23-30564

Chapter 11

**DECLARATION OF PAUL J. PASCUZZI
IN SUPPORT OF DEBTOR'S
APPLICATION TO EXTEND TIME TO
FILE SCHEDULES AND STATEMENT
OF FINANCIAL AFFAIRS**

[No Hearing Required]

1 I, Paul J. Pascuzzi, declare as follows:

2 1. I am an attorney at law, duly licensed to practice before the above-entitled court, and
3 am Counsel in the law firm of Felderstein Fitzgerald Willoughby Pascuzzi & Rios LLP and counsel
4 for The Roman Catholic Archbishop of San Francisco, the Debtor and Debtor in Possession herein
5 (the “Debtor” or “RCASF”). I have personal knowledge of the following facts and if called as a
6 witness could competently testify thereto.

7 2. I make this declaration in support of the Debtor’s application for entry of an order
8 extending the time for the Debtor to file its Schedules and Statement of Financial Affairs
9 (“Schedules”) for 16 days from September 5, 2023, up to and including September 21, 2023 (the
10 “Application”) and as required by Bankruptcy Local Rule 9006-1(c). All terms not otherwise
11 defined herein have the same meaning as the Application.

12 **Reasons for the Extension of Time**

13 3. The deadline for the Debtor to file its Schedules is September 5, 2023. Due to the
14 amount of information that needs to be gathered from multiple sources to prepare the Schedules,
15 and the various demands on the Debtor’s employees, the Debtor needs additional time to prepare
16 the Schedules.

17 **Previous Time Modifications Related to the Subject of the Request**

18 4. No request for additional time has been made previously with respect to the filing of
19 Schedules.

20 **The Effect of the Requested Time Modification on the Schedule for the Case**

21 5. With the proposed extension up to and including September 21, 2023, Schedules will
22 be filed a week before the Debtor’s meeting of creditors scheduled for September 28, 2023. The
23 Debtor’s Initial Debtor Interview (“IDI”) is scheduled for September 26, 2023.

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1 **Efforts Made to Speak with Office of the United States Trustee**

2 6. I communicated with Jason Blumberg, counsel for the Office of the United States
3 Trustee (“oust”), on August 22, 2023, regarding this Application and coordinating the scheduling
4 of the IDI and 341 meeting in connection with the Debtor’s anticipated filing of the Schedules.

5 I declare under penalty of perjury under the laws of the United States of America that the
6 foregoing is true and correct. Executed on this 29th day of August, 2023, at Sacramento, California.

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8 /s/ Paul J Pascuzzi
9 PAUL J PASCUZZI
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